

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: April Russo  
Special Agent: Amy Hirina, FBITelephone: (313) 226-9129  
Telephone: (248) 879-6090UNITED STATES DISTRICT COURT  
for the  
Eastern District of MichiganUnited States of America  
v.  
Anthony NAIMANCase:2:19-mj-30333  
Judge: Unassigned,  
Filed: 06-12-2019 At 03:43 PM  
USA v. ANTHONY NAIMAN (CMP)(MLW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 12, 2019 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section*

18 U.S.C. §§ 2252A(a)(5)(B) and 2252A(a)(2)

*Offense Description*Access with intent to view child pornography and receipt and distribution of  
child pornography.

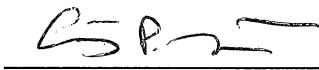
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.  
Complainant's signature

Special Agent Amy Hirina, F.B.I.

Printed name and title

Sworn to before me and signed in my presence.

Date: June 12, 2019City and state: Detroit, Michigan  
Judge's signature

Hon. Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Amy Hirina, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Detroit Division, being duly sworn, depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent of the FBI since 2005, and am currently assigned to the FBI Detroit Division, Oakland County Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations. I have received training in the area of child pornography and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute arrest warrants issued under the authority of the United States.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for ANTHONY NAIMAN (DOB 09/XX/1978) for violations of

18 U.S.C. § 2252A(a)(5)(B) (access with intent to view child pornography) and 18 U.S.C. § 2252A(a)(2) (receipt and distribution of child pornography).

## II. PROBABLE CAUSE

4. KIK Messenger is a free, instant messaging application for mobile devices, developed by Kik Interactive and available on various mobile operating systems. KIK uses usernames, not phone numbers, as the basis for KIK accounts, chats and other communication. Based on my training and experience, I know that KIK is primarily used as a cell phone application, but can also be accessed on a computer.

5. An undercover FBI agent observed KIK user “78antnaiman” post a video of an approximately nine-year old little girl being raped by an adult male. Your affiant reviewed this video and it meets the federal definition of child pornography.

6. On or about February 5, 2019, the <sup>ent (Undercover Employee)</sup> UCE began communicating privately with KIK user “78antnaiman” who had a profile name “Anthony Naiman.” The two had conversations that spanned several days, and in those conversations, Naiman sent child pornography to the UCE and talked about engaging in sexual activity with a relative of his. An example of their conversations is below:

UCE	Nice stuff, where ya from, Indiana here
<b>78antnaiman</b>	Michigan You have anything?
UCE	Yep, my 14 yo stepdaughter
UCE	U active?

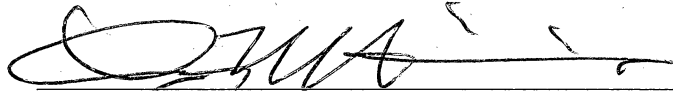
<b>78antnaiman</b>	Active? You have any pics of her?
UCE	U play with any young?
<b>78antnaiman</b>	When I can
UCE	Yes I do What was youngest?
<b>78antnaiman</b>	13-14  [Image sent of a nude female, approximately 16-17 years old, posing in a mirror and taking a selfie.]  That's my <b>[FEMALE RELATIVE]</b> . She's 17
UCE	How did you get that, Did you get to play with her?
<b>78antnaiman</b>	She sent it to me a few weeks ago. Yes we've played a few times.
UCE	No way!
<b>78antnaiman</b>	Can I see a pic of your step daughter?
	Conversation continues...
<b>78antnaiman</b>	Mmmmmm You should try and get a pic of her banked. Naked*
UCE	Ikr..I plan on it, her mom is gone next weekend  she was sexually active at 12. Her mom said she caught her in a 3 way last year before we got married
<b>78antnaiman</b>	Wow. That's hot!!!  [Sends video of an approximately seven year-old little girl positioned on her hands and knees while a male penetrates her. Your affiant reviewed this video and it meets the federal definition of child pornography]

**Identifying ANTHONY NAIMAN as “78antnaiman”**

7. The FBI conducted open source database searches for Anthony Naiman and discovered that an Anthony Naiman (DOB: September XX, 1978) resided at XXX4 Sylvia Drive in Troy, Michigan. The FBI then obtained Naiman’s Michigan Secretary of State photograph and compared it to the profile picture for “78antnaiman.” The two photographs depicted the same male.

8. On June 12, 2019, the FBI executed a search warrant at Naiman’s residence on Sylvia Drive. Naiman was present at the time of the search and lives alone at the residence. The FBI recovered several electronic devices. Naiman agreed to speak to the FBI and admitted that he had used the KIK account “78antnaiman” to access, send, and receive child pornography. Naiman stated that he had communicated with over half a dozen 15 to 17-year old boys on the Internet and had those boys send him pictures of their genitalia. He also said that he had masturbated on web cam with underage boys and that, when he was in his mid to late 20s, he had anal sex with his preteen or teenage minor male relative. He also stated that he and the male relative masturbated in the same room together.

9. Your Affiant believes that probable cause exists that ANTHONY NAIMAN (DOB: 09/XX/1978) violated 18 U.S.C. § 2252A(a)(2) (Receipt and Distribution of Child Pornography), and 18 U.S.C. § 2252A(a)(5)(B) (Possession of Child Pornography).



Amy Hirina  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed to before me  
on this 12<sup>th</sup> day of June 2019:



Hon. Anthony P. Patti  
United States Magistrate Judge